West Virginia Department of Environmental Protection Division of Air Quality

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on March 9, 2018.

Permit Number: R30-08300017-2018

Applications Received: October 5, 2020 and April 29, 2021

Plant Identification Number: 03-054-083-00017 Permittee: Columbia Gas Transmission, LLC Facility Name: Glady Compressor Station

Mailing Address: 1700 MacCorkle Avenue SE, Charleston, WV 25314

Permit Action Number: MM01 and MM02 Revised: July 27, 2021

Physical Location: Glady, Randolph County, West Virginia

UTM Coordinates: 615.52 km Easting • 4,293.19 km Northing • Zone 17

Directions: From US Route 33 East, turn right on Secondary Route 27 at Alpena. Proceed

approximately 10 miles to Glady, turn left on Route 22 and travel approximately

1 mile to the station located on the left side of road.

Facility Description

The Glady Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of three (3) 1,320 hp, Ingersoll-Rand 48KVS, 4SLB reciprocating engines, one (1) 325 hp, Waukesha F2895GL, 4SRB reciprocating engine/generator, one (1) 608 hp, Waukesha VGF-H24GLD, 4SLB reciprocating engine/generator, one (1) 312 mmscf/day Barnhart Tech TEG dehydration unit, one (1) 5.74 mmBtu/hr NATCO SVH-3 dehydrator flare, two (2) 15.0 mmBtu/hr NATCO line heaters, two (2) 1.0 mmBtu/hr NATCO SB/18-14 TEG reboilers, and one (1) 1.512 mmBtu/hr Peerless Model # 211A-10-N heating system boiler.

This minor modification is based on recently issued permits R13-2218D (December 29, 2020) and R13-2218E (May 17, 2021). It covers the construction of two (2) Methanol Storage Tanks (A30 and A32), and the incorporation of an additional three (3) Methanol Storage Tanks (A25, A26 and A27) and one (1) Methanol Loading Rack (LR-1). The tanks (A25, A26 and A27) were constructed in 2002, and the Loading

Rack was constructed in 2001, but they were previously overlooked. Therefore, they are now included in the permit.

Emissions Summary

This minor modification resulted in the following emission changes:

Pollutant	Change in potential emissions	Facility-wide PTE after the
	(+ or -), TPY	modification MM01/ MM02, TPY
NOx	0	1,128.23
CO	0	163.88
VOC	+ 1.69	35.68
PM_{10}	0	3.51
SO_2	0	1.73
Methanol	+ 1.69	1.69
Total HAPs	+ 1.69	20.55

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 1,128.23 TPY of NOx and 163.88 TPY of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Columbia Gas Transmission, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State: 45CSR13 Permits for construction/modification

45CSR30 Operating permit requirement.

State Only: N/A

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit (if any)
R13-2218E	May 17, 2021	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under

the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

As the result of this minor modification, the following changes were done to the permit:

- 1. Emission Units Table 1.1 added five Methanol Storage Tanks A25, A26, A27, A30 and A32 and one Methanol Loading Rack LR-1.
- 2. Condition 3.5.3 revised to reflect changes in the US EPA address.
- Condition 3.7.2 Permit Shields for 40 C.F.R. 60 Subpart OOOO and 40 C.F.R. 60 Subpart OOOOa were revised to reflect newly added Methanol Storage Tanks and a Methanol Loading Rack.
- 4. Section 8.0 added to include requirements for the Methanol Storage Tanks A25, A26, A27, A30 and A32.
- 5. Section 9.0 added to include requirements for the Methanol Loading Rack LR-1.
- 6. Since the format of the R13-2218D / R13-2218E permits was changed to the new R13 permit format, and their requirements were re-numbered, several corrections were made throughout the permit to reflect these changes.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- 40 C.F.R. 60 Subpart OOOO "Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015". Since Methanol Storage Tanks A25, A26 and A27 were constructed prior to August 23, 2011, and Methanol Storage Tanks A30 and A32 were constructed after September 18, 2015, requirements of this subpart are not applicable to these tanks.
- 2. 40CFR60 Subpart OOOOa "Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced after September 18, 2015"- this subpart applies to the owners or operators of one or more of the onshore affected facilities, including storage vessel affected facility which is a single storage vessel that commenced construction, reconstruction or modification after September 18, 2015 but before November 16, 2020 (as per 40 C.F.R. §60.5365a(e)(1)), or after November 16, 2020 (as per 40 C.F.R. §60.5365a(e)(2)), if its potential for VOC emissions is equal to or greater than 6 TPY. Subpart OOOOa is not applicable to the newly added Methanol Storage Tanks A25, A26 and A27 because they were constructed before the applicability date of September 18, 2015. Potentially, Subpart OOOOa might be applicable to newly added Methanol Storage Tanks A30 and A32 constructed in 2021, but their PTE for VOC is not expected to be at or above 6 TPY, because a combined VOC emission limit for all newly added Methanol Storage Tanks (including tanks A30 and A32) listed under requirement 8.1.2 is 1.03 TPY (below 6 TPY). Therefore, requirements of this subpart are not applicable to Methanol Storage Tanks A25, A26, A27, A30 and A32.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not applicable for minor modifications.

Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.